

*** Filed ***
04:51 PM, 07 Jul, 2025
U.S.D.C., Eastern District of New York

July 8, 2025

VIA ECF

The Honorable Pamela K. Chen
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: IME Watchdog, Inc. v. Safa Gelardi, et al.

Case No. 1:22-cv-01032-PKC-JRC

Response to July 7, 2025 Sanctions Order

Dear Judge Chen:

I respectfully submit this response in connection with the Court's July 7, 2025 Order imposing a \$500 sanction for failure to make the July 1, 2025 payment to Berkeley Research Group (BRG).

As previously disclosed to the Court in prior filings, I am currently facing severe financial hardship due to ongoing litigation restraints — including the New York State Department of Taxation's levy on my personal bank accounts. These levies, which I provided documentation of in prior motions (including my filings in connection with the Emergency Motion to Remove the Property Attachment), have frozen all available liquid funds and rendered timely payments functionally impossible, despite my continued efforts to comply in good faith.

The July 1 payment delay was not willful. I did not, and do not, have access to the necessary funds due to the very legal entanglements now being cited to justify sanctions. I am taking every action available to resolve the outstanding obligations and remain committed to satisfying the BRG payment as soon as technically feasible. I fully intend to submit both the \$500 BRG payment and the \$500 sanction imposed by the Court — and will file proof of payment accordingly.

Nonetheless, I respectfully note for the record that the Court's order imposes sanctions without inquiry, notice, or consideration of the very financial conditions this Court has been informed of multiple times, and which are themselves the result of Plaintiff's unsupported damages claims and the ongoing asset freeze. I will comply with the order under protest and respectfully preserve my objection to the purpose of future review.

Thank you for your attention.

Respectfully submitted,

Safa Gelardi

Pro Se Defendant